Modern Slavery Policy Statement

Company Policy

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Author:
Adam Flude

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1 Introduction

While Delta HV falls below the annual turnover threshold required for mandatory reporting under Section 54 of the Modern Slavery Act 2015, we are committed to preventing modern slavery and human trafficking in our business and supply chains. We publish this statement voluntarily to outline the steps we take to uphold ethical standards.

It is a fundamental policy of Delta HV Ltd to conduct its business with honesty and integrity and in accordance with the highest standards of ethics, equity and fair dealing. We know that slavery, human trafficking, servitude and forced labour (Modern Slavery and Human Trafficking) is a global and increasing challenge for governments and business.

2 Definition

The company considers that the term modern slavery encompasses:

- Human trafficking.
- Forced work, through mental or physical threat.
- Being owned or controlled by an employer through mental or physical abuse of the threat of abuse.
- Being dehumanised, treated as a commodity, or being bought or sold as property.
- Being physically constrained or to have restriction placed on freedom of movement.

3 Company Commitment

The company acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The company does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour. No labour provided to the company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The company strictly adheres to the minimum standards required in relation to its responsibilities under the relevant employment legislation.

4 Organisational Structure, Business and Supply Chains

Delta HV Limited is a specialist electrical engineering company based in the south east of England. We specialise in greenfield high voltage substation installations as well as upgrades and modifications to existing substation infrastructure. We deal with Clients from both the regulated market and the private sector. Delta HV Ltd has supply chains including contractors, sub-contractors, and suppliers. The head office is in Eastbourne, East Sussex, England and operates site offices located as and where the projects require it. The business currently operates in the UK only.

5 Risk Assessment and Due Diligence Process

Delta HV Ltd has zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values. In general, the Company considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that

such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

- We limit the geographical scope of our operations to the UK, Ireland and Europe.
- Where possible we build long standing relationships with local suppliers and make clear our expectations of business behaviour.
- With regards to national or international supply chains, our point of contact is preferably with a UK or Ireland company, or branch and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.
- We have systems in place to encourage the reporting of concerns and the protection of whistle blowers.

5.1 Supply Chains

In order to seek to prevent Modern Slavery and Human Trafficking in our business and supply chains we have begun a due diligence process which has identified the need to introduce specific questions relating to Modern Slavery and Human Trafficking during the pre-qualification of our sub-contractors and suppliers.

We use the following measures to check how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Right to work checks completed at recruitment stage
- Ensure minimum employment age adhered to, in line with the relevant legislation.
- Always apply national minimum wage thresholds, in line with the relevant legislation
- Regular contact with material suppliers including their understanding of, and compliance with, our expectations.

6 Slavery Compliance Responsibility

Delta HV Ltd has established appropriate responsibilities and accountability to support compliance with the Modern Slavery Act 2015. Any concerns regarding modern slavery will be taken seriously and appropriate action will be taken. Although Delta HV Ltd falls below the turnover threshold for mandatory reporting under Section 54 of the Modern Slavery Act 2015, we publish this statement voluntarily as part of our commitment to preventing modern slavery and human trafficking within our business and supply chains.